

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V DRAFT Permit No. V-97-026
COOPER TIRE AND RUBBER COMPANY
MOUNT STERLING, KY
May 4, 2000
Christina A. Forgacs

SOURCE DESCRIPTION:

The two new lines, the dual durometer line #1 (SN-24) and the cascade line #1 (SN-25) involve a sequence of operations on a strip of material that moves continuously down a line. Main operations include rubber extrusion and curing, coating application and curing, then cooling and cutting operations. The company has included two process flow diagrams in their application (log F275) to be referenced for specific identification of each step in the process.

COMMENTS: (FOR THE PROJECT PROPOSED IN F275)

This project is a significant revision to Cooper Tire's Title V/Federally enforceable permit number F-95-016. The permit included an emissions cap of 130 tons per year volatile organic compounds. With this proposal, the emissions cap must be increased above the 130 tons per year permit limit. The Division is raising the annual volatile organic compound emissions cap to 225 tons per year, still maintaining the source's synthetic minor status.

Applicable regulation(s)

Regulation 401 KAR 59:015, New indirect heat exchangers, applies to one boiler for this project F275 that is not yet installed at the facility which is rated less than 10 MMBtu/hour. Regulation 401 KAR 59:010, New process operations, applies to particulate emissions from the paint booths. The Kentucky State Air Toxics Regulation 401 KAR 63:022 applies sourcewide to several toxic pollutants disclosed in the application above the adjusted significant level: carbon disulfide, isophorone, and trimethylbenzene.

Regulations that are not applicable

Currently, for the project F275, only the regulations listed above apply. There is not yet an applicable MACT/NESHAPs standard for this type of manufacturing plant; however, please note that once the Plastics Parts and Products Surface Coating MACT standard is issued in 2000, this facility should be reviewed to determine applicability of this MACT. Note also that this source does NOT manufacture the rubber from raw materials. The rubber is shipped to the site and extruded at the site but is not manufactured from raw materials at this site. Therefore, the Polymers and Resins Production MACT standard(s) do not apply. A case by case MACT determination is not required at this time for the source.

Several toxic air pollutants listed in 401 KAR 63:022 are no longer limited because more recent Rubber Manufacturer's Association (RMA) emission factors indicate that these are emitted at less than their respective adjusted significant levels.

Emission and Operating Caps description

For the proposed construction (log F275) potential volatile organic compound emissions are approximately 37 tons per year, continuous. Hazardous Air Pollutants potential emissions (continuous) are less than 25 tons per year for project F275, approximately 11 tons per year. Single HAP emissions are each less than 10 tons per year for project F275. PM_{10} potential emission (continuous) is 0.18 ton per year.

The annual emissions cap for volatile organic compounds is being increased from 130 tons per year to 225 tons per year; therefore a significant revision to federally enforceable permit F-95-016 is necessary. This will require the public, affected states, and EPA review procedures previously employed for points 01 through 23, and the resulting permit will be federally enforceable.

Regarding the Kentucky State Air Toxics requirements, as a result of the proposed construction and newer emission factors for previous emissions units, the carbon disulfide sourcewide allowable needs to be adjusted as shown in the permit to 56.0 pounds per hour, an increase from 10.2 pounds per hour. Carbon disulfide is expected to be emitted as a vapor and is classed as an inorganic compound. As a result of more recent company submitted emissions calculations, the trimethylbenzene allowable is being adjusted to reflect the new emissions based on more recent factors to 3.78 pounds per hour. Note that based on more recent company submitted emissions calculations, several air toxic chemicals are indicated as emitted at less than their respective adjusted significant levels. The appropriate emission limits have thus been removed from the permit.

This source has particulate emissions estimated to be less than 10 tons per year total; thus, the associated particulate emitting units are assumed to be in compliance given the throughput and operating limits of this permit.